

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

**JOSE RAMON VEGA ARROYO**

DEBTOR

**CASE NO: 13-00415-EAG**

CHAPTER 13

**DEBTOR-APPELLANT'S DESIGNATION OF ITEMS TO BE  
INCLUDED IN THE RECORD AND STATEMENT OF ISSUES ON  
APPEAL**

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TO THE HONORABLE BANKRUPTCY COURT:

COMES NOW Debtor-Appellant Jose Ramon Vega Arroyo, through the undersigned attorney, and very respectfully states and prays:

Pursuant to Federal Rule of Appellate Procedure 6(b)(2)(B) and Federal Rule of Bankruptcy Procedure 8009 the Debtor/Appellant respectfully designates the items to be included in the record on appeal to the First Circuit and the statement of the issues to be presented.

**A) DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON  
APPEAL:**

**Case No. 13-00415-EAG**

1. Docket 1 (1/23/13) – Chapter 13 Voluntary Petition.
2. Docket 41 (12/20/13) – Amended Chapter 13 Plan dated 12/20/13.
3. Docket 46 (1/13/14) – Trustee favorable recommendation of plan dated

12/20/13.

4. Docket 47 (3/11/14) – Order Confirming Plan dated 12/20/2013.

5. Docket 107 (10/19/16) – Motion for Post Confirmation Modification of Chapter 13 Plan.

6. Docket 109 (10/20/16) – Trustee favorable recommendation of debtor's plan dated 10/19/16.

7. Docket 111 (11/16/16) – Order Confirming Debtor's Post Confirmation Modification Chapter 13 plan dated 10/20/16.

8. Docket 173 (4/02/18) – Trustee's Certification To Close Case With Discharge.

9. Docket 174 (4/02/18) – Trustee Final Report and Account Plan Completed and (30) days objection language for trustee's discharge.

10. Docket 175 (4/17/2018) – Discharge of Debtor.

11. Docket 177 (5/07/18) – Order Discharging Trustee and Closing Estate.

12. Docket 179 (7/19/19) – Motion to Reopen Chapter 13 Case and Grant Alfredo Cancel Irizarry Leave to Consummate Judgment.

13. Docket 189 (9/09/19) – Opposition to Motion to Reopen Case at docket no. 179.

14. Docket 192 (9/30/19) – Reply to Opposition To Motion for Leave to Alfredo Cancel Irizarry to Consummate Judgment.

15. Docket 196 (10/22/19) – Motion submitting documents: Certified Translation and to be Excuse for late filing.

16. Docket 201 (12/19/19) – Minutes of the proceedings: Order.

17. Docket 206 (2/13/20) – Memorandum of law in compliance with Court order at docket no. 201.

18. Docket 211 (3/17/20) – Reply to Jose Ramon Vega's Memorandum of Law.

19. Docket 212 (8/13/20) – Opinion and Order.

B) STATEMENT OF THE ISSUES ON APPEAL:

1. Whether the Honorable Bankruptcy Court for the District of Puerto Rico erred in determining that the order of confirmation of the plan precludes Alfredo Cancel Irizarry from executing a state court judgment issued after the case was confirm.

2. Whether the Honorable Bankruptcy Court for the District of Puerto Rico erred in determining that the discharge order prohibits Alfredo Cancel Irizarry from executing a state court judgment issued after the case was confirm.

WHEREFORE, Debtor/Appellant respectfully requests that this Honorable Panel: take notice of the docket entries which are relevant to the instant appeal; and, take notice of the statement of the issues to be decided.

RESPECTFULLY SUBMITTED,

In Yauco, Puerto Rico, this 6 day of October, 2020.

NYDIA GONZALEZ ORTIZ

/s/ Nydia Gonzalez Ortiz

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 06, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and a copy will be generated by the system to the attorney(s) of record for the parties.

NYDIA GONZALEZ ORTIZ

/s/ Nydia Gonzalez Ortiz

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